## ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law 100 Lafayette Street, Suite 501 New York, NY 10013

Franklin A. Rothman Jeremy Schneider Robert A. Soloway David Stern

Tel: (212) 571-5500 Fax: (212) 571-5507

Rachel Perillo

September 26, 2023

**By ECF** 

Hon. George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, New York 1007 SO ORDERED:

orge D. Daniels, U.S.D.J

Dated: SFP 2 6 2023

Re:

United States v. Karlos Alberto De La Puerta Rodriguez

18 Cr. 782 (GBD)

Dear Judge Daniels:

I represent Karlos Alberto De La Puerta Rodriguez in the above-named matter, having been appointed pursuant to the Criminal Justice Act. Mr. De La Puerta is on pretrial release and under courtesy supervision in the Southern District of California, where he resides. He is scheduled to be sentenced on September 28, 2023 at 10:30 a.m.

Without objection from the government, by AUSA Kyle Wirshba, and Pretrial Services Officer Ashley Cosme, it is respectfully requested that Mr. De La Puerta be permitted to travel from California to New York on September 27, 2023, the day before his sentencing, and be permitted to spend the night in a hotel in Brooklyn, New York. If this application is granted, Mr. De La Puerta will provide Pretrial Services with his travel itinerary and hotel information.

Additionally, it is respectfully requested that the Court order the United States Marshals to furnish funds for Mr. De La Puerta's travel from California to New York as well as his hotel stay. At sentencing, counsel intends to make an application for voluntary surrender, and in the event that the Court grants that application, it is respectfully requested that the United States Marshals provide funds for Mr. De La Puerta's return flight to California on September 28, 2023.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted, /s/

David Stern